

ROSS AMSEL RABEN
NASCIMENTO

ALAN S. ROSS (1950 - 2018)
ROBERT G. AMSEL
DAVID RABEN
JOSEPH E. NASCIMENTO

WWW.CRIMLAWFIRM.COM

2250 S.W. 3RD AVE. | 4TH FLOOR
MIAMI, FLORIDA 33129
PHONE: 305-858-9550
FAX: 305-858-7491

March 6, 2025

By ECF and E-Mail

The Honorable Nusrat J. Chodhury
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: United States v. Michael S. Jeffries, et. al.
Criminal Docket No. 24-423 (NJC)(SLT)
Joint Request to Adjourn March 13, 2025 Status Conference

Dear Judge Chodhury:

On October 17, 2024, an indictment was returned charging the defendants with one count of sex trafficking and 15 counts of interstate prostitution. On October 22, 2024, all three defendants were arrested outside of this District. Defendants Jeffries and Jacobson were released on bonds the same day, and appeared before this Court on October 25, 2024 for arraignment. Mr. Smith was extradited to this District, arraigned and released on bond on December 3, 2024.

The parties appeared, in-person, before this Court on December 10, 2024 for a status conference. The parties informed the Court that additional time was required to exchange and review the voluminous discovery in this case and discuss potential resolutions of the matter short of trial. Accordingly, the Court set this matter for a status conference on March 13, 2025 at 11:00 a.m., and permitted the Defendants to appear via telephone.

Since the December status conference, the Government has made substantial discovery disclosures, including *Jencks Act* material. On February 28, 2025, the parties were advised that this Court would be in trial from March 12, 2025 to March 21, 2025 and unavailable for the scheduled status conference. The Court offered to reschedule the status conference to a date before the March 12, 2025 trial commenced, however, given the volume of the materials provided, and the additional discovery disclosures that are expected, the parties believe a later date would be more appropriate.

We have conferred with counsel for the Government, as well as counsel for Jeffries and Jacobson, and all have indicated that they join in the instant request and are available to appear before this Court for a status conference on May 1, 2025 at 1:00 p.m., a date and time that we understand to be convenient for the Court.

The parties believe that good cause exists to exclude the time between March 13, 2025 and May 1, 2025 under the Speedy Trial Act, and that the ends of justice served by granting the continuance outweigh the best interests of the public and the parties in a speedy trial. Defense counsel for Jeffries, Smith and Jacobson have discussed the right to a speedy trial under the Speedy Trial Act with all three defendants, and counsel has confirmed that all three defendants waive their right to a speedy trial, consent to the requested continuance and agree that time is excludable up to and including May 1, 2025.

We greatly appreciate Your Honor's time and consideration in this matter, and should the Court need any further information we remain available at the Court's convenience.

Respectfully Submitted,

A handwritten signature in black ink, appearing to be 'JN' followed by a stylized flourish.

Joe Nascimento, Esq.
David Raben, Esq.
Counsel for Matthew Smith
(305) 858-9550

cc: Counsel of Record (by ECF)